



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

AUG 23 2012

Ref: 8P-W-UIC

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chris Douglass
East Cherry Creek Valley
Water & Sanitation District
6201 South Gun Club Road
Aurora, Colorado 80016

RE: Minor Modification
EPA UIC Permit CO12143-08425
Well: ECCV DI-1
NWSE Sec. 1-T1S-R66W
Adams County, Colorado

Dear Mr. Douglass:

The Environmental Protection Agency Region 8 has received the East Cherry Creek Valley Water & Sanitation District's (ECCV) June 14, 2012, letter with enclosures requesting an increase in the Maximum Allowable Injection Pressure (MAIP) for the ECCV DI-1 well. The enclosed Step Rate Test (SRT) results were reviewed and approved by the EPA. Therefore, the MAIP for UIC Permit CO12143-08425 is hereby increased to 3,200 psig from the 1,485 psig previously authorized.

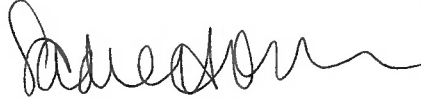
As of the date of this letter, the EPA authorizes continued injection into the ECCV DI-1 well under the terms and conditions of UIC Permit CO12143-08425 at the MAIP of 3,200 psig. Please be reminded that it is the responsibility of the owner/operator to be aware of, and to comply with, all conditions of the permit and relevant modifications as issued.


As of this approval, responsibility for permit compliance and enforcement is transferred to the Region 8 UIC Technical Enforcement Program office. Please direct all future notification, reporting, monitoring and compliance correspondence to the following address, referencing your UIC Permit number and well name.

US EPA Region 8
UIC Technical Enforcement Program
Mail Code: 8ENF-UFO
1595 Wynkoop Street
Denver, Colorado 80202-1129

If you have questions regarding the above action, please call Wendy Cheung at (303) 312-6242 or (800) 227-8917, extension 312-6242. For questions regarding notification, testing, monitoring, reporting or other Permit requirements, please contact Sarah Roberts of the UIC Technical Enforcement Program at (303) 312-7056.

Sincerely,



 Callie A. Videtich
Acting Assistant Regional Administrator
Office of Partnerships and Regulatory Assistance

cc: Denise Onyskiw
Colorado Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, Colorado 80203

Re: ECCV justification

Wendy Cheung

to:

Linda Bowling

08/16/2012 08:42 AM

Cc:

cheung.wendy, Ron Mellor

Hide Details

From: Wendy Cheung/R8/USEPA/US

To: Linda Bowling/R8/USEPA/US@EPA

Cc: cheung.wendy@epa.gov, Ron Mellor/R8/USEPA/US@EPA

Linda,

The software that the service company used automatically determines an ISIP value once they stop injecting. However, the ISIP in this case does not have any physical significance if the formation never opened. You need to first evaluate the data set and the step rate test results that they presented did not show that a break occurred. Unfortunately we were not able to get downhole pressure data so they has to calculate friction loss. The reason that Ron evaluated the data was to review whether or not the friction calculations that they used was reasonable and his conclusion was that it was.

When I spoke to Dan last, he indicated that he was good with the modification. Please let me know if you need additional information.

Wendy Cheung
US EPA Region 8
Mailcode: 8P-W-GW
1595 Wynkoop Street
Denver, CO 80202-1129
work: (303) 312-6242
fax: (303) 312-7084

-----Linda Bowling/R8/USEPA/US wrote: -----

To: cheung.wendy@epa.gov
From: Linda Bowling/R8/USEPA/US
Date: 08/16/2012 08:27AM
Cc: Ron Mellor/R8/USEPA/US@EPA
Subject: ECCV justification

Wendy,

I've been out of the office but I wanted to follow-up with you on the ECCV step rate test review. Specifically for Permit No. CO12143-08425. Dan J. left a message for me to follow-up with you on this one. It is my understanding that Ron reviewed the request and helped with the determination that the formation never opened so it did not close. An ISIP was provided in the submittal as a routine part of the company's process. The ISIP recorded on the submitted forms does not represent a point in time where the formation closed. Rather it represents some point in time where the company may have chosen to measure pressure, i.e. when the well was shut in. Please let me know if you agree with this explanation so that I may move the ECCV request forward. Thanks Wendy and/or Ron Mellor.

Linda M. Bowling
US Environmental Protection Agency, Region 8
Underground Injection Control Unit
1595 Wynkoop Street
Mailcode: 8P-W-UIC
Denver, CO 80202
Phone: 303-312-6254
Fax: 303-312-6741

BHWIP Step Rate Test Comparison Class I Injection Well ECCV DI-1

